

1 Law Office of Wanda K. Day
2 Box 86840
Tucson, Arizona 85754
3 Pima Computer No. 13190
4 AZ Bar No. 012684
(520) 791-9630

5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF ARIZONA**

8 UNITED STATES OF AMERICA,
9 Plaintiff,
10 v.

11 ELBER ZAVALA-GUTIERREZ,
12
13 Defendant.

CR-07-0622 - TUC-CKJ-GEE

**MOTION TO CONTINUE TRIAL
AND OTHER DATES**

(Unopposed)

(Second Request)

14 It is expected that excludable delay under Title 18, United States Code,
15 §3161(h)(8)(B)(iv) will occur as a result of this motion or an order based thereon.
16 Defendant, ELBER ZAVALA-GUTIERREZ, through counsel, respectfully requests this
17 Court to continue the plea deadline, trial and all other dates presently set in this
18 case for approximately forty-five (45) days from the current trial date of July 31,
19 2007. Counsel needs a reasonable amount of additional time to effectively prepare
20 for trial as she exercises due diligence in the preparation of the case for trial. (18
21 USC 3161(h)(8)(B)(iv))

22 Assistant United States Attorney Claire Lefkowitz has no objection to the
23 continuance. Also, the defendant does not object to a continuance.

24 This is the second request for continuance by undersigned counsel.
25 It is expected that excludable delay under Title 18, United States Code,
26 §3161(h)(1)(F) will occur as a result of this motion or an order based thereon.
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Law Office of Wanda K. Day
Box 86840
Tucson, Arizona 85754
Pima Computer No. 13190
AZ Bar No. 012684
(520) 791-9630

RESPECTFULLY SUBMITTED: July 13, 2007.

LAW OFFICE OF WANDA K. DAY

____/s/____Wanda K. Day
Wanda K. Day

Copy of the foregoing
Motion and proposed
Order mailed/delivered to:
– Claire Lefkowitz, Esq., AUSA